



Lourdes M. Rosado
President and General Counsel

June 24, 2025

The Hon. Jessica G. L. Clarke
United States District Court
Southern District of New York
500 Pearl Street, Room 1040
New York, NY 10007

Via ECF

Re: *Reyes v. City of New York*, 23-cv-6369

Dear Judge Clarke,

On June 18, 2025, the Second Circuit certified the following question to the New York Court of Appeals: “Does either N.Y. Civ. Rights Law § 79-p or N.Y.C. Admin. Code § 14-189 afford individuals such as Plaintiff Reyes the right to video record law enforcement activities inside public facilities – specifically, inside the publicly accessible lobbies of police stationhouses – notwithstanding a New York City Police Department policy forbidding any video recording inside its facilities?”

As such, counsel write jointly to request that the proceedings in this case be stayed¹ until either:

- the Court of Appeals accepts the certified question, and thereafter renders a decision; or
- the Court of Appeals does not accept the certified question, and the Second Circuit thereafter renders a decision.

Counsel jointly agree that staying the proceedings in this matter as set forth above would best serve the interest of judicial efficiency and the preservation of the parties’ resources.

¹ Counsel intends to submit the confidentiality stipulation regarding the video recording depositions by June 27 per this Court’s June 16 order.



Respectfully submitted,

/s/ Karen Munoz Trevino

cc: All Counsel via ECF